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14 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN JOSE DIVISION**

16 JEFFREY SCHULKEN AND JENIFER	)	CASE NO. 5:09-cv-02708-LHK
SCHULKEN, individually and on behalf of a	)	
17 class of similarly situated individuals,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
Plaintiffs,	)	<b>ORDER TO CONTINUE EXPERT</b>
18 v.	)	<b>DISCOVERY DEADLINES</b>
19 WASHINGTON MUTUAL BANK,	)	
HENDERSON, NEVADA; JPMORGAN CHASE	)	Fifth Am. Complaint filed: 10/14/2011
20 BANK, N.A.,	)	Judge: Hon. Lucy H. Koh
Defendants.	)	
21	)	

22 WHEREAS, on October 13, 2011, the Court held a hearing on Plaintiffs' Motion for  
 23 Class Certification which the Court took under advisement;

24 Whereas, on October 14, 2011, Plaintiffs Jeffrey and Jennifer Schulken ("Plaintiffs")  
 25 filed their Fifth Amended Complaint, to which Defendant JPMorgan Chase Bank, N.A.  
 26 ("Defendant") filed its Answer on October 28, 2011;

1 WHEREAS, on December 30, 2011, the Parties file a proposed Stipulation asking the  
2 Court to continue discovery deadlines, including deadlines related to expert discovery. The  
3 reason was, at that time, the Parties were uncertain as to what expert discovery may be  
4 needed or relevant following this Court's ruling on Plaintiffs' Motion for Class Certification;

5 WHEREAS, on January 5, 2012, this Court entered an Order Granting in Part and  
6 Denying in Part Plaintiffs' Motion for Class Certification.

7 WHEREAS, the present deadlines for expert disclosures are set as follows:

8 Additional Expert Disclosures Due	February 3, 2012
9 Rebuttal Expert Disclosures Due	February 17, 2012
10 Discovery cut-off:	March 28, 2012

11 WHEREAS, the Parties, being in receipt of the Court's Order on the Motion for Class  
12 Certification and being focused on concluding merits discovery (and still discussing  
13 settlement), seek an additional 30 day extension of certain of the relevant expert deadlines,  
14 and propose new deadlines as follows (without any change to the Pretrial Conference or Trial  
15 dates):

16 Additional expert disclosures:	March 2, 2012
17 Additional rebuttal expert disclosures:	March 23, 2012
18 Discovery cut-off:	March 30, 2012

19 This Stipulation is made in good faith and not for the purposes of delaying this  
20 litigation.

1 Respectfully submitted,

2  
3 Dated: January 26, 2012

4 By: /s/ Sean Reis

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10 *Attorneys for Plaintiffs,*  
JEFFREY AND JENIFER SCHULKEN

Dated: January 26, 2012

By: /s/ Victoria Collado

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*Attorneys for Defendant,*  
JPMORGAN CHASE BANK, N.A.

**ORDER**

19  
20 Pursuant to the stipulation,  
21 IT IS SO ORDERED.

22 Dated: January 30, 2012

  
UNITED STATES DISTRICT JUDGE LUCY H. KOH